

Corporate Procedure for the Management of Conflicts of Interest

**Approved by the Board of Directors
of El Corte Inglés, S.A.
on 27 June 2018**

Version 5.1 (29 October 2025)

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NOTE: The definitions of the most frequently used terms in this document and in the regulations that make up the EL CORTE INGLÉS Criminal Compliance Management System are provided in **Annex 1**.

1. Introduction and Legal Framework

This Corporate Procedure for the Management of Conflicts of Interest (hereinafter, the Procedure) reflects the intention of the Governing Body of El Corte Inglés, S.A. to: (i) align itself with best practices in corporate governance, in particular those relating to the management of conflicts of interest; and (ii) comply with the legislation in force in this area, in particular the following:

- Royal Legislative Decree 1/2010, of 2 July, approving the revised text of the Corporate Law.
- Royal Legislative Decree 4/2015, of 23 October, approving the revised text of the Securities Market Law.
- Organic Law 10/1995 of 23 November, approving the Criminal Code.

This document is classified as a Corporate Procedure and therefore forms part of the internal regulations of the El Corte Inglés Group, being mandatory for all companies that make up the Group.

This Corporate Procedure develops the provisions relating to conflicts of interest set out in the Code of Ethics¹, and, accordingly, as internal regulations, shall be subject to appropriate information, training and dissemination activities.

The management of conflicts of interest involving directors and senior managers of the El Corte Inglés Group is particularly relevant, given their role as representatives of the Organisation and as supervisors of its operations, as well as the exemplary conduct they are expected to demonstrate in the fulfilment of their obligations.

The Board of Directors of El Corte Inglés, S.A., as the body responsible for approving corporate strategy and corporate policies, approved this Corporate Procedure for the Management of Conflicts of Interest, following a proposal from the Audit and Control Committee, at its meeting held on 27 June 2018.

¹ Article 7 of the Code of Ethics provides that “*The Group’s managers and employees shall refrain from engaging in any behaviour or activity that may give rise to a personal benefit (direct or indirect) or to any collision or conflict of interest (whether personal, familial, involving other related parties, another employee, a supplier or a collaborating company) with the interests of the El Corte Inglés Group. Where applicable, any such situation shall be reported to the Company through the established channels.*”

Finally, oversight of compliance with this Procedure shall correspond to the Audit and Control Committee, as the body competent in this matter.²

2. Purpose

The purpose of this Procedure is to establish the appropriate channels to ensure that, in situations involving a potential conflict of interest, such conflict is managed without any adverse effects on business activity, the ethical principles governing such activity, or the legitimate interests of the parties concerned.

A potential conflict of interest shall be deemed to exist between the El Corte Inglés Group, on the one hand, and its directors, officers or employees, on the other, where the impartiality of the actions of the latter, or of persons reporting to them, whether acting on their own behalf or on behalf of third parties, may be directly or indirectly affected.

This regulation aims to define the rules of conduct and the procedure to be followed by the Group, its governing bodies, directors, employees and other collaborators in order to prevent, avoid, manage and, where appropriate, resolve potential conflicts of interest.

3. Scope of Application

This Procedure is mandatory and applies globally to the companies forming part of the El Corte Inglés Group (hereinafter, the 'Organisation') in all their activities and, in particular, those related to the value chain, both upstream and downstream, regardless of the country in which they are carried out, as well as to the affected stakeholder groups.

All Members of the Organisation, particularly those involved in the value chain, shall comply with the contents of this Procedure, irrespective of the position they hold or the territory from which they operate. This Procedure shall also apply to Business Partners when carrying out activities within the Group, as well as to other stakeholders involved in the value chain.

This commitment shall be formalised as set out in the following section.

4. Awareness and Statement of Compliance

Compliance with ethical rules and standards represents both a corporate commitment and a strategic objective for the Organisation. Therefore, all Members of the Organisation are expected to be familiar with and adhere to the contents of this Procedure.

² Article 3 of the Regulations of the Audit and Control Committee provides that: "~~The Committee shall periodically report to the Board of Directors, in particular, on (...) (iii) potential conflicts of interest and related party transactions.~~"

Likewise, all Business Partners are expected to act in accordance with its principles.

This commitment shall be formalised through:

- i. Statements of compliance with the principles set out herein by Members of the Organisation, through their adherence to the **High Ethical Standards**.
- ii. **Compliance clauses included in contracts** with Business Partners
- iii. **Formal agreements or acknowledgement** by the governing bodies of the companies within the El Corte Inglés Group, in accordance with applicable internal regulations.

Such agreements and their renewals shall be notified to the El Corte Inglés Group's Compliance and Risk Control Department.

In the event of significant changes to this Procedure (i.e. changes that require formal approval from the Board of Directors of El Corte Inglés, S.A.), the preceding commitments shall be formally renewed.

The Organisation shall respond promptly to any breach of the provisions set out in this Procedure, in accordance with its internal regulations and in compliance with all applicable legislation.

5. Principles of the Procedure for the Management of Conflicts of Interest

Safeguarding: In all cases, the objective of safeguarding the interests of the El Corte Inglés Group, as well as the principle of equal treatment of its shareholders and customers, shall prevail over any personal interests, whether direct or indirect, whether acting on one's own behalf or on behalf of others, of its directors, managers, employees or collaborators that may be affected.

Information: In cases of doubt, the obligation to report any situation from which a potential conflict of interest may arise shall prevail.

Inhibition: As a general rule, the principle to be applied in the resolution of any type of conflict of interest shall be that of inhibition or abstention. Accordingly, persons affected by a potential conflict of interest shall refrain from participating in decision-making processes that may affect the natural or legal persons involved in such potential conflict of interest.

Loyalty: In any situation involving a conflict of interest between directors, managers, employees or collaborators and the El Corte Inglés Group, such persons shall at all times act loyally towards the Group, giving precedence to the Group's interests over their own or any other competing interests.

Confidentiality: In all cases, the confidentiality and security of personal, family or business-related data disclosed in declarations of potential conflicts of interest shall be ensured.

Impartiality: In any situation involving a potential conflict of interest, the governing bodies or responsible internal instances of the El Corte Inglés Group shall act impartially and professionally.

Agility: In order to provide reassurance as promptly as possible to all parties involved, efforts shall be made to process queries and propose clear solutions with the greatest possible speed.

Efficacy: Efforts shall be made to identify the solutions that are most appropriate for the optimal development of the Group's business activities and the professional activities of the affected individual.

Transparency: In the disclosure of potential conflicts of interest, and in particular those that may arise with shareholders and directors, the El Corte Inglés Group shall endeavour to act with the highest level of transparency towards the competent authorities or regulatory or supervisory bodies.

6. Obligated Persons and Communication Channels

This Corporate Procedure shall apply to all directors, managers, employees and other collaborators of the El Corte Inglés Group (hereinafter, the Obligated Persons).

Obligated Persons shall be required to periodically disclose their situation in relation to potential conflicts of interest, in the following manner and under the following terms:

- **Directors:** Directors shall submit, on an annual basis, a written declaration to the Chairperson of the Audit and Control Committee, either in negative terms (absence of conflicts) or in positive terms (existence of potential conflicts).
- **Senior Management and Members of Corporate Committees:** Senior Management and members of Corporate Committees shall submit, on an annual basis, a written declaration to the Compliance and Risk Control Department, either in negative terms (absence of conflicts) or in positive terms (existence of potential conflicts).

- Compliance and Risk Control Area, Compliance Officers in subsidiaries, Compliance Representatives in entities included within the criminal prevention perimeter, Representatives of Regulatory Compliance, Internal Control and Methods and Processes, Internal Control and Fraud Prevention Area, and Internal Audit Area: On an annual basis, they shall submit a written declaration to the Compliance and Risk Control Department, either in negative terms (absence of conflicts) or in positive terms (existence of potential conflicts).
- Employees of the Procurement divisions (direct and indirect) maintaining direct relationships with suppliers, and employees of all divisions maintaining professional relationships with Public Administrations: On an annual basis, they shall submit a written declaration to the Compliance and Risk Control Department, either in negative terms (absence of conflicts) or in positive terms (existence of potential conflicts).
- Directors, managers, employees and other collaborators of the Group: Where a potential conflict of interest arises, they shall submit a declaration, using the form set out in Annex 2, through the application enabled for this purpose on the corporate intranet NEXO.

The completion and submission of these declarations shall be mandatory. Failure to do so may be considered a breach of the Group's guidelines, with the consequences arising therefrom in accordance with the applicable regulations.

7. Persons Whose Interests Are Included within the Scope of Obligated Persons

For the purposes of this Procedure, persons whose interests are included within the scope of the Obligated Persons shall be those legally considered to be related persons³, and, in any event, the following:

- Their spouses or any person linked to them by a relationship of similar affective nature in accordance with applicable legislation.
- Persons related to them by kinship up to the second degree⁴, inclusive, whether by blood or affinity.

³ In the event of significant changes to this Procedure (i.e. changes that require formal approval from the Board of Directors of El Corte Inglés, S.A.), the preceding commitments shall be formally renewed.

⁴ Pursuant to Articles 915 et seq. of the Civil Code, second-degree relatives shall include grandparents, parents, children, grandchildren and siblings (by blood), as well as parents-in-law, sons-in-law, daughters-in-law and siblings-in-law (by affinity).

- Other relatives who have cohabited with them for at least one year prior to the existence of the potential conflict.
- Interposed companies or entities: legal entities or fiduciary arrangements in which the Obligated Persons hold, directly or indirectly, including through intermediaries, a shareholding of at least 10% of the capital or voting rights; exercise decision-making powers; are able to influence decision-making; or whose economic interests are substantially equivalent to those of the Obligated Persons.
- Interposed persons: natural persons acting as agents or trustees of the Obligated Persons or of the entities referred to in the preceding paragraph, or to whom the Obligated Person transfers, in whole or in part, the risks inherent in the transactions carried out.

Potential conflicts of interest relating to persons whose interests fall within the scope of the Obligated Persons shall be disclosed by the latter in accordance with Section 6, under the same terms and conditions as those applicable to their own interests.

8. Definition of Conflicts of Interest

A conflict of interest is a situation involving potential ethical, financial or impartiality risk arising as a result of a concurrence of interests of an individual (their own interests or those of other persons or entities included within their personal sphere of influence, whether direct or indirect) with the interests or objectives that such individual is required to protect in the course of their work, professional or business activity, or with those protected by third-party employees who may feel influenced upon becoming aware of such concurrence.

Any member of the Organisation may, at a given time, find themselves in a situation involving a conflict of interest in the course of their professional activity, without this necessarily implying irregular conduct. However, where a potential conflict of interest arises, it shall be necessary to establish protective measures in order to ensure that due impartiality in decision-making is not affected.

By way of example only, and without being exhaustive, a potential conflict of interest may arise, among others, in the following cases:

- Where a personal relationship is maintained with an individual working for a supplier, collaborator or service provider of the Organisation, and it is possible to influence the terms of the business relationship.

- Where there is a family, affinity, affective relationship or close friendship with a person who is hierarchically or functionally dependent on the individual, and it is possible to influence the assessment of their work or a potential review of their conditions.
- Where an individual is involved in a company project or assignment and is aware that its outcome may have a positive or negative impact on their personal or family interests.

Accordingly, in order to prevent any loss of impartiality and to ensure neutrality towards shareholders, customers, suppliers or collaborators, any director, manager, employee or collaborator who becomes aware of such concurrence of interests shall clearly and promptly disclose it through the application enabled for this purpose on the corporate intranet NEXO, so that it may be assessed and, where appropriate, an adequate solution may be proposed to ensure neutrality in their professional conduct:

[Through the application enabled for this purpose on the corporate intranet NEXO: Ethics and Compliance \(Declaration of Conflicts of Interest\).](#)

In addition, the following email address is available for raising any questions or queries relating to any potential conflict of interest in which a person may be involved at a given time: (conflictodeintereses@elcorteingles.es)

Likewise, any person who becomes aware of a potential conflict of interest affecting a third party shall report it via the same email address.

Where an Obligated Person, being aware of the existence of a concurrence of conflicting interests, fails to disclose it at the outset of the situation, it shall be presumed that they have sought to conceal the potential conflict, with the consequences arising therefrom in accordance with the Code of Ethics and the applicable commercial, labour and, where appropriate, criminal legislation.

9. Prevention of Conflicts of Interest

For the purpose of preventing potential conflicts of interest, two types of measures are established:

- General Measures, including:
 - The inclusion, within the Code of Ethics, of provisions relating to conflicts of interest.
 - The adoption of procedures, such as this one, which develop the provisions set out in the Code of Ethics.
- Organisational measures, including:
 - The establishment of restrictions on access to certain information.

- Measures aimed at preventing or limiting any person from exercising undue influence over the manner in which another person carries out purchasing or sales activities.
- Relocation to another centre, area or department of the Organisation where there is direct hierarchical dependence between individuals (employees) who maintain a family or similar affective relationship, in accordance with Section 7 of this Procedure, always taking into account the versatility of the persons concerned and the Organisation's operational needs.
- Preservation of the principle of segregation of duties within the Group's organisation and the establishment of appropriate supervisory procedures, particularly in the case of purchases of goods or services.
- Monitoring of specific training plans relating to corporate governance policies.
- Maintenance of communication channels for reporting the existence of potential conflicts of interest.

10. Processing, Consultation and Resolution of Conflicts

10.1 Processing Body

Communications submitted by directors shall be forwarded, through the Secretary of the Board of Directors, to the Chairperson of the Audit and Control Committee.

The processing of communications submitted by managers, employees and other collaborators of the El Corte Inglés Group shall be carried out by the Compliance and Risk Control Department, with the assistance of the Human Resources Department where necessary.

The Compliance and Risk Control Department, as well as any person involved in the processing of the communications, shall refrain from acting where, due to the persons affected by the communication or the subject matter concerned, a conflict of interest arises. In such cases, processing shall be assigned to a qualified person in whom no such conflict exists.

The Compliance and Risk Control Department shall maintain an up-to-date register of the conflict-of-interest declarations submitted.

Where the Compliance and Risk Control Department has doubts regarding the actual impact of the conflict and/or the manner in which it should be resolved, it shall consult the Audit and Control Committee.

Once a declaration has been submitted, the declarant shall refrain from participating in any matters, decisions or commitments that may be affected by the situation covered by the declaration until a resolution is issued by the Compliance and Risk Control Department.

Where such abstention could cause economic or strategic harm to the Organisation, the declarant shall inform the Compliance and Risk Control Department and their direct line manager, who, following such consultations as they deem necessary, shall adopt a provisional decision until the procedure is resolved.

Upon receipt of the declaration, the situation described shall be assessed and, where necessary, the declarant or the heads of the affected or conflicting areas shall be requested to provide any relevant clarifications or additional information.

Following the preliminary analysis, declarations shall be classified into one of the following three categories:

- Category "A": Due to their particular relevance, these declarations require the Compliance and Risk Control Department to submit a proposed resolution to the Audit and Control Committee for decision.
- Category "B": These declarations require analysis by the Compliance and Risk Control Department, which may, where necessary, consult the Human Resources Department and/or the declarant's immediate superior in order to determine the actual existence of a conflict of interest. Once the relevant response has been received, the appropriate resolution shall be adopted.
- Category "C": No action is required, as no conflict of interest exists.

10.2 Resolution

The resolution shall be agreed and communicated in writing to the declarant as soon as possible and, in any event, within a period not exceeding 30 calendar days.

Where the resolution entails a change in the allocation of tasks or the performance of operations, it shall also be communicated to the Human Resources Department, which shall inform the heads of the affected areas or departments accordingly. Such resolution shall take effect from the date on which it is received by the relevant manager.

10.3 Changes in Circumstances

Declarants shall be obliged to report any changes occurring in the circumstances that gave rise to the initial declaration. Where applicable, such new declaration shall give rise to the processing of the procedure described above, and an express resolution regarding the new situation shall be communicated.

10.4 Confidentiality

In all cases, the confidentiality and security of the personal data communicated in the declaration shall be safeguarded, and such data shall remain under the custody of the Compliance and Risk Control Department.

10.5 Disciplinary measures

Where unjustified delay, falsity, concealment or bad faith is identified in the communication, the Compliance and Risk Control Department shall report the matter to the competent body for the adoption of the appropriate disciplinary measures, in accordance with the Workers' Statute and/or the applicable Collective Bargaining Agreement.

10.6 Legal Proceedings

Where indications of the commission of a criminal offence are identified, the Compliance and Risk Control Department shall forward its conclusions to the Legal Advisory Department, so that, where appropriate, the matter may be brought to the attention of the competent judicial authorities.

11. Reporting of Non-Compliance

Any Member of the Organisation, Business Partner or Third Party with a direct relationship and legitimate commercial or professional interest, who becomes aware of a breach of this Procedure or who has doubts as to whether an observed practice may constitute an unlawful act, whether in the public or private sector, shall immediately contact the Compliance and Risk Control Department of the El Corte Inglés Group. This shall be done via the Ethics Channel, using any of the available means of communication:

- **Digital Channel:**

The El Corte Inglés Group's digital channel can be accessed via the following website:

<https://www.elcorteingles.es/informacioncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/>

This access is available on the corporate website and, additionally, on the NEXO intranet for Members of the Organisation.

- **Postal address:**

El Corte Inglés, S.A.
Compliance and Risk Control
Hermosilla, 112
28009 Madrid

- **Compliance and Risk Control Department – Phone number:** 91 401 85 00

- **Request for a face-to-face or remote meeting**

The information communicated through this Channel is confidential, as is the identity of reporting persons acting in good faith, whose cooperation the Organisation appreciates and in respect of whom it guarantees the absence of retaliation of any kind.

In addition, the Compliance and Risk Control Department may act on its own initiative by investigating any indication of non-compliance with Procedure.

12. Approval, Effective Date and Updating

This Procedure shall become effective on the date of its approval by the Board of Directors of El Corte Inglés, S.A.

This Procedure shall be kept up to date over time. To this end, it shall be reviewed regularly, on an annual basis, and on an extraordinary basis where necessary, and in any event as promptly as possible in the event of changes to the Group's strategic objectives or to internal or external regulatory requirements that require its update or amendment.

The Compliance and Risk Control Department shall be responsible for assessing any proposed amendments, with the support of the Compliance and Risk Control Committee.

In addition, where such changes are significant, they shall be submitted for approval to the Board of Directors, following a proposal from the Audit and Control Committee.

13. Dissemination

Once approved by the Board of Directors of El Corte Inglés, S.A., this Procedure shall be made available on NEXO for all Members of the Organisation and on the corporate website for all ECI Group stakeholders.

Likewise, the Compliance and Risk Control Department shall promote the necessary actions to ensure its proper dissemination and awareness.

14. Control, Monitoring and Supervision

14.1 Control and Monitoring

The Compliance and Risk Control Department shall be responsible for controlling and continuously monitoring compliance with the provisions of this Procedure, in accordance with the procedure set out in the Charter and the Regulations of the Compliance Function Bodies.

14.2 Supervision

The Internal Audit Function shall review the Group's Criminal Compliance Management System to the extent that the Annual Audit Plan approved by the Audit and Control Committee includes work related to such system, and, on an extraordinary basis, in the event of incidents or the identification of irregularities. Following such audits, the Internal Audit Function shall issue the corresponding report, including recommendations where opportunities for improvement are identified.

Any opportunities for improvement that may be identified as a result of these reviews shall be considered as part of the continuous improvement process of the Criminal Compliance Management System.

Version History

Version 1.0 approved by the Board of Directors on 27/Jun/2018

Version	Date of amendment	Purpose of the amendment	Sections affected
2.0	30/June/2021	<ul style="list-style-type: none"> - Include the principle of loyalty. - Adapt the procedure to the conflict-of-interest management tool. - Reflect the nature of the new Compliance and Risk Committee. 	<ul style="list-style-type: none"> - Principles of the Procedure for the Management of Conflicts of Interest - Processing, Consultation and Dispute Resolution - Updating
3.0	30/Nov/2022	<ul style="list-style-type: none"> - Adapt the system to the recent integration of the Risk Control and Management area under the Regulatory Compliance Department. - Include new legal regulations - Include a non-exhaustive list of examples of possible conflicts of interest - Modify the management of conflicts of interest - Include an updated record of conflict declarations. - Include a more detailed definition of the three categories into which conflicts can be classified. - Include the duty for any person who becomes aware of a potential conflict of interest of a third party to report it. - Clearly outline the steps to be taken if the conflict of interest involves the body responsible for processing. - Update definitions 	<ul style="list-style-type: none"> - Introduction and Legal Framework - Definition of Conflicts of Interest - Processing, Consultation and Resolution of Conflicts - Annex 1 Definitions

Version	Date of amendment	Purpose of the amendment	Sections affected
4.0	28/Jun/2023	<ul style="list-style-type: none"> - Update the scope of application - Include members of Corporate Committees among those required to renew the annual declaration of conflicts of interest. - Include an express reference to the responsibility for control and supervision of the Compliance Function and the Internal Audit Function. - Update definitions 	<ul style="list-style-type: none"> - Scope of Application - Control, Monitoring and Supervision - Annex 1 Definitions
5.0	30/Oct/2024	<ul style="list-style-type: none"> - Align policy with the requirements of the Corporate Sustainability Reporting Directive - Include particularly exposed groups in the annual statement - Regulatory Compliance and Risk Control area annual statement - Rename categories - Include a reference to the new internal rules governing Group companies' compliance with the Corporate Policies. - Update digital channels for reporting non-compliance - Include 'Dissemination' section 	<ul style="list-style-type: none"> - Scope of Application - Obligated Persons and Communication Channels - Processing, Consultation and Resolution of Conflicts - Awareness and Statement of Compliance - Reporting of Non-Compliance - Dissemination
5.1	29/Oct/2025	<ul style="list-style-type: none"> - Introduce the possibility of relocation to another centre 	<ul style="list-style-type: none"> - Prevention of Conflicts of Interest

Last revision, 29 October 2025

Annexes

Annex 1 - Definitions

Below are the definitions of the terms most frequently used in this document and in the related rules that make up the EL CORTE INGLÉS Criminal Compliance Management System.

- **Audit and Control Committee:** A standing body of the Board of Directors with an informative and advisory role, without executive functions. It has full powers to provide information, offer advice and make proposals within its remit, which includes, among other areas, Regulatory Compliance.
- **Board of Directors:** The governing body of El Corte Inglés, S.A., ultimately responsible for the management and results of the activities carried out by the Company, its system of governance and corporate policies, to which Senior Management reports and is accountable.
- **Business Partners:** Any natural or legal person, other than Members of the Organisation, with whom the Organisation maintains or intends to establish a business relationship. By way of example, but not limited to, this includes intermediaries such as agents or commission agents, external advisers, suppliers, customers, joint ventures, or any natural or legal persons contracted by any of the companies within the EL CORTE INGLÉS GROUP for the delivery and/or receipt of goods and/or the provision of services.
- **Chief Compliance Officer / Regulatory Compliance and Risk Control Department:** A single-body function, endowed with autonomous powers of initiative and control, entrusted, among other responsibilities, with supervising the proper functioning of the Organisation's Compliance Management System in general, and the Criminal Compliance Management System in particular. The existence of the Criminal Compliance body fulfils the requirement established in Spanish criminal legislation (Article 31 bis of the Spanish Criminal Code) regarding supervision of the Criminal Compliance Management System.
- **Compliance and Risk Control Committee:** A collegial body of an executive nature and oriented towards decision-making, entrusted with advising the Head of the Compliance Function and the Head of the Risk Control and Management Function on all matters it deems relevant in the performance of their respective functions.
- **Crime Prevention Policy (Criminal Compliance Policy):** A document reflecting the commitment of Senior Management and the Board of Directors of El Corte Inglés, S.A. to compliance and the Organisation's strategic objectives in this area, including its determination not to tolerate any conduct that may constitute a criminal offence or non-compliance.
- **Criminal Compliance Management System:** An organisational and management system for the prevention of criminal offences, the purpose of which is the prevention, detection and management of criminal risks through their integration into business processes, as well as their measurement for continuous improvement. Its essential basis is set out in the Crime Prevention Policy (Criminal Compliance Policy), the Compliance Programme and the List of Key Criminal Compliance Controls. It is also referred to as the 'System'.

- **EL CORTE INGLÉS:** Includes El Corte Inglés, S.A. and the entities that fall within its Criminal Control Perimeter.
- **El Corte Inglés Group / Group / Organisation:** The group of companies that make up the El Corte Inglés Group, whose parent company is El Corte Inglés, S.A. The El Corte Inglés Group is composed of a number of subsidiaries subject to two differentiated compliance approaches: a first group operating under autonomous and independent compliance management, and a second group forming part of the Criminal Compliance Control Perimeter of El Corte Inglés, S.A.
- **Members of the Organisation:** Members of the Board of Directors, Senior Management, executives, employees, temporary workers or workers under collaboration agreements, volunteers of the Organisation, and any other persons under the hierarchical authority of any of the above.
- **Senior Management:** Employees of the Organisation who, by decision of the Board of Directors and under its organic or functional dependence, or that of one of its Committees or members, are classified as such by exercising powers inherent in the legal ownership of the Company and relating to its general objectives, with autonomy and full responsibility, limited only by the criteria and direct instructions issued by the governing bodies.
- **Third Party:** Any natural or legal person or independent body external to the Organisation.
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Annex 2 - Conflict of Interest Declaration Form

I hereby declare, under my responsibility, that **I may have a conflict of interest** as a result of the tasks or duties assigned to me or carried out under my responsibility within the El Corte Inglés Group, **due to the existence of a relationship:**

- Direct (myself) Of my spouse/partner or a relative up to the second degree¹
 Through an interposed company² Through an interposed person³

With:

Name and surname of the person with whom there is a relationship:
Name of the company to which the person with whom there is a relationship belongs: <input type="checkbox"/> El Corte Inglés Group company <input type="checkbox"/> Supplier or Business Partner <input type="checkbox"/> Competitor <input type="checkbox"/> Others
Job title or position held by the person with whom there is a relationship in that company:
Description of the potential conflict of interest, including an indication as to whether it is circumstantial or structural:

I hereby undertake to provide, at the request of the El Corte Inglés Group, any additional documentation that may be required in relation to the potential conflict of interest declared herein.

In, on of of

Signed:

1 According to Articles 915 et seq. of the Civil Code, second-degree relatives include grandparents, parents, children, grandchildren and siblings (by blood), as well as parents-in-law, sons-in-law, daughters-in-law and siblings-in-law (by affinity).
2 Interposed companies or entities: Legal entities or fiduciary arrangements in which the obligated person holds, directly or indirectly (including through intermediaries), at least 10% of the capital or voting rights; exercises decision-making power or significant influence over decisions; derives economic interests substantially equivalent to their own.
3 Interposed persons: Natural persons acting as agents or trustees on behalf of the obligated person or the aforementioned companies/entities, or individuals to whom the obligated person transfers all or part of the risks associated with transactions.